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June 13, 2025

BY ECF AND EMAIL

Hon. Analisa Torres, U.S.D.J
United States District Court,
Southern District of New York
500 Pearl Street
New York, NY 10007

**Re: Avangrid Networks, Inc. v. Security Limits Inc., No. 22 Civ. 9622 (AT)
Consent Letter Motion for Extension of Time to Move to Dismiss Defendant's
Counterclaims**

Dear Judge Torres:

We represent Plaintiffs Avangrid Networks, Inc., and Avangrid Service Company. As the Court is aware, on May 27, 2025, the Court granted Plaintiff Avangrid Networks, Inc.'s request to file a motion to dismiss the counterclaims filed by Defendants, Security Limits Inc. and Paulo Silva, and set a briefing schedule [Dkt. 79]. In its Order, the Court set the following deadlines:

By June 23, 2025, Plaintiff shall file its motion.
By July 21, 2025, Defendants shall file their opposition.
By August 4, 2025, Plaintiff shall file its reply, if any

We write to request an extension of these deadlines.

On June 2, 2025, I wrote an email to Mr. Edward Troy, counsel for Defendants, and requested that they stipulate to extensions of these deadlines, proposing to extend the deadline to file the motion through and including July 16, to move the opposition deadline to August 13, and to move the reply to September 3. I explained that each of the three primary attorneys on this matter have obligations that cause us to make the request: Mr. Sanderson is in a three week bench trial in New York that started on June 2nd, and Mr. Mockler was and is in Europe on a pre-planned business trip followed by vacation for three weeks starting June 2. And I had and have a number of depositions scheduled in the coming weeks, including travel.

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In response, later that same day, Mr. Troy called me and indicated that he needed to discuss the extension with his client, and that he would get back to me promptly. Mr. Troy did not get back to me. I then emailed Mr. Troy again on June 9, 2025, but Mr. Troy did not respond. I then called him on June 12, 2025, and he said he would call his client right away and call me back within 15 minutes.

Earlier today, Mr. Troy consented to Plaintiff's proposed extensions of time.

This is Plaintiff's first request for an extension of time of these deadlines.

Accordingly, for the foregoing reasons, Plaintiff respectfully requests that the Court set the following schedule:

By July 16, 2025, Plaintiff shall file its motion.

By August 13, 2025, Defendants shall file their opposition.

By September 3, 2025, Plaintiff shall file its reply, if any

Respectfully submitted,



Thomas Watson